1	Rick Hernandez Hernandez Law Offices, LLC.	
2	P.O. Box 1039	
3	Sunnyside, WA 98944 (509) 837-3184	
4	Attomay for Cabriela Vasquez Mandaza	
5	Attorney for Gabriela Vasquez Mendoza	
6	UNITED STATES D	ISTRICT COURT
7	EASTERN DISTRICT OF WASHINGTON	
8	UNITED STATES OF AMERICA,	}
9	Plaintiff,	} } No. 4:15-CR-6049-EFS-7
10	VS.	} } MOTION AND DECLARATION
11) TO CONTINUE
12	GABRIELA VASQUEZ MENDOZA,	<pre>} SENTENCING }</pre>
13	Defendant.	Without Oral Argument Monday May 21, 2018 @6:30pm
14		} Worlday Way 21, 2016 (£0.50pm)
15		
16	COMES NOW the Defendant Gabrie	la Vasquez Mendoza, by and through her
17		
18	attorney of record, Ricardo Hernandez, and moves this court for an order continuing	
19	the sentencing date in the above matter.	
20	This motion is based upon the court file in the instant case, and the	
21	accompanying declaration of counsel.	
22		
23	DATED this 18th day of May 2018.	
24		
25		s/ Ricardo Hernandez Ricardo Hernandez
26		Washington State bar #21463
27		Attorney for Gabriela Vasquez Mendoza Hernandez Law Office, LLC
28		440 S. 6 th St. / P.O. Box 1039 Sunnyside, WA 98944
	MOTION TO CONTINUE -	RICARDO HERNANDEZ. HERNANDEZ LAW OFFICE 440 S 6" STREET

MOTION TO CONTINUE SENTENCING

RICARDO HERNANDEZ. HERNANDEZ LAW OFFICE 440 S. 6" STREET P.O. BOX 1039 SUNNYSIDE, WA 98944 (509) 837-3184

1 Telephone: (509) 837-3184 Fax- 509-515-2083 2 Email: rick@rickhernandez.lawyer 3 4 **DECLARATION** 5 RICARDO HERNANDEZ, being first duly sworn upon oath, deposes and 6 States as follows: 7 1. I am the attorney of record for the defendant Gabriela Vasquez Mendoza in the above 8 matter. 9 10 2. The Sentencing date in this matter is set for Tuesday, June 12, 2018 @ 2:00pm. 11 3. The defendant was recently diagnosed with a very serious illness. The defendant had 12 surgery last month. 13 4. Defense counsel has provided the government with a medical document signed by the 14 defendant's doctor confirming the details of the defendant's medical issues. 15 5. For this reason we are requesting that sentencing on this matter be continued for 90 days. 16 6. Defense counsel is also requesting new deadlines for filing objections to PSIR and 17 Sentencing Memorandum. 18 19 7. The government has no objection to continue sentencing for 90 days. 20 I hereby certify under penalty of perjury under the laws of the State of Washington that the 21 foregoing is true and correct to the best of my knowledge. 22 Dated this 18th day of May 2018 23 24 s/ Ricardo Hernandez Ricardo Hernandez 25 Washington State bar #21463 Attorney for Gabriela Vasquez Mendoza 26 Hernandez Law Office, LLC 27 440 S. 6th St. / P.O. Box 1039 Sunnyside, WA 98944 28 Telephone: (509) 837-3184 RICARDO HERNANDEZ. HERNANDEZ LAW OFFICE MOTION TO

MOTION TO CONTINUE SENTENCING

RICARDO HERNANDEZ. HERNANDEZ LAW OFFICE 440 S. 6" STREET P.O. BOX 1039 SUNNYSIDE, WA 98944 (509) 837-3184

Fax- 509-515-2083 1 Email: rick@rickhernandez.lawyer 2 3 4 5 **CERTIFICATE OF SERVICE** 6 7 I hereby certify that on May 18, 2018 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such 8 filing to the following: Stephanie Van Marter, Assistant U.S. Attorney. 9 10 11 s/ Ricardo Hernandez Ricardo Hernandez 12 Washington State bar #21463 Attorney for Gabriela Vasquez Mendoza 13 Hernandez Law Office, LLC 440 S. 6th St. / P.O. Box 1039 14 Sunnyside, WA 98944 15 Telephone: (509) 837-3184 Fax- 509-515-2083 16 Email: rick@rickhernandez.lawyer 17 18 19 20 21 22 23 24 25 26 27 28 MOTION TO

CONTINUE SENTENCING